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9 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

10  
11 UNITED STATES DISTRICT COURT  
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

No. 23-00468-TJH

14 Plaintiff,

STIPULATION REGARDING REQUEST FOR  
(1) CONTINUANCE OF TRIAL DATE AND  
(2) FINDINGS OF EXCLUDABLE TIME  
PERIODS PURSUANT TO SPEEDY TRIAL  
ACT

15 v.

16 HAYK MARTIROSYAN,

**CURRENT TRIAL DATE:** 01/30/24  
**PROPOSED TRIAL DATE:** 02/20/24

17 Defendant.

18  
19 Plaintiff United States of America, by and through its counsel  
20 of record, the United States Attorney for the Central District of  
21 California and Assistant United States Attorney Brittney M. Harris,  
22 and defendant Hayk Martirosyan ("defendant"), both individually and  
23 by and through his counsel of record, George G. Mgdesyan, Esq.,  
24 hereby stipulate as follows:  
25

26 1. Defendant first appeared before a judicial officer of the  
27 court pursuant to a Criminal Complaint on September 11, 2023. The  
28 Indictment was filed on September 22, 2023. The Speedy Trial Act, 18

1 U.S.C. § 3161, originally required that the trial commence on or  
2 before December 1, 2023. Co-defendant Samvel Grigroyan is currently  
3 a fugitive.

4       2. On September 29, 2023, the Court set a trial date of  
5 November 14, 2023, at 10:00 a.m. A pretrial conference was  
6 subsequently scheduled for October 16, 2023, at 10:00 a.m. The Court  
7 subsequently continued the trial to January 30, 2024, and the  
8 pretrial conference to January 8, 2024, at 10:00 a.m., and found the  
9 interim time to be excluded under the Speedy Trial Act.

10      3. Defendant is detained pending trial. The parties estimate  
11 that the trial in this matter will last approximately two days.

12      4. By this stipulation, defendant moves to continue the trial  
13 date to February 20, 2024, at 10:00 a.m., and the pretrial conference  
14 to February 12, 2024, at 10:00 a.m. This is the second request for a  
15 continuance.

16      5. Defendant requests the continuance based upon the following  
17 facts, which the parties believe demonstrate good cause to support  
18 the appropriate findings under the Speedy Trial Act:

19           a. Defendant is charged with a violation of 18 U.S.C.  
20 §§ 371, 1960: Unlicensed Money Transmitting Business; Conspiracy.  
21 The government has prepared discovery for the defense should it be so  
22 requested, including reports, recordings, and photographs. The  
23 government has provided approximately 800 items of discovery to  
24 defense, including audio recordings, transcripts, reports, and other  
25 items.

26           b. On September 15, 2023, defendant's current counsel  
27 substituted in as counsel of record. Defense counsel is presently  
28 scheduled to be in the following trials: United States v. Darbinyan,

1       et al., CR No. 22-00034-CJC, which is scheduled to commence on  
2       January 23, 2024, and United States v. Airapetian, CR No. 23-00243-  
3       RGK, which is scheduled to commence on January 30, 2024.

4       Accordingly, counsel represents that he will not have the time that  
5       he believes is necessary to prepare to try this case on the current  
6       trial date.

7                   c.      In light of the foregoing, counsel for defendant also  
8       represents that additional time is necessary to confer with  
9       defendant, conduct and complete an independent investigation of the  
10      case, conduct and complete additional legal research including for  
11      potential pre-trial motions, review the discovery and potential  
12      evidence in the case, and prepare for trial in the event that a  
13      pretrial resolution does not occur. Defense counsel represents that  
14      failure to grant the continuance would deny him reasonable time  
15      necessary for effective preparation, taking into account the exercise  
16      of due diligence.

17                  d.      Defendant believes that failure to grant the  
18      continuance will deny him continuity of counsel and adequate  
19      representation.

20                  e.      The government does not object to the continuance.

21                  f.      The requested continuance is not based on congestion  
22      of the Court's calendar, lack of diligent preparation on the part of  
23      the attorney for the government or the defense, or failure on the  
24      part of the attorney for the Government to obtain available  
25      witnesses.

26                 6.      For purposes of computing the date under the Speedy Trial  
27      Act by which defendant's trial must commence, the parties agree that  
28      the time period of the date of the Court's corresponding order to

1 February 20, 2024, inclusive, should be excluded pursuant to 18  
2 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(i) and (h)(7)(B)(iv) because the  
3 delay results from a continuance granted by the Court at defendant's  
4 request, without government objection, on the basis of the Court's  
5 finding that: (i) the ends of justice served by the continuance  
6 outweigh the best interest of the public and defendant in a speedy  
7 trial; (ii) failure to grant the continuance would be likely to make  
8 a continuation of the proceeding impossible, or result in a  
9 miscarriage of justice; and (iii) failure to grant the continuance  
10 would unreasonably deny defendant continuity of counsel and would  
11 deny defense counsel the reasonable time necessary for effective  
12 preparation, taking into account the exercise of due diligence.

13       7. Nothing in this stipulation shall preclude a finding that  
14 other provisions of the Speedy Trial Act dictate that additional time  
15 periods be excluded from the period within which trial must commence.  
16 Moreover, the same provisions and/or other provisions of the Speedy  
17 Trial Act may in the future authorize the exclusion of additional  
18 time periods from the period within which trial must commence.

19 IT IS SO STIPULATED.

20 Dated: December 22, 2023 Respectfully submitted,

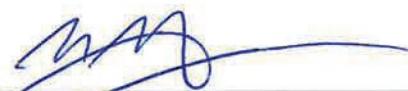
21 E. MARTIN ESTRADA  
United States Attorney

23 MACK E. JENKINS  
Assistant United States Attorney  
Chief, Criminal Division

25 /s/ Brittney M. Harris  
26 BRITTNEY M. HARRIS  
Assistant United States Attorney

27 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

1 I am Hayk Martirosyan's attorney. I have carefully discussed  
2 every part of this stipulation and the continuance of the trial date  
3 with my client. I have fully informed my client of his Speedy Trial  
4 rights. To my knowledge, my client understands those rights and  
5 agrees to waive them. I believe that my client's decision to give up  
6 the right to be brought to trial earlier than February 20, 2024 is an  
7 informed and voluntary one.



12/29/24

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9 GEORGE G. MGDESYAN, ESQ.  
10 Attorney for Defendant  
11 HAYK MARTIROSYAN

Date

12 This agreement has been read to me in Armenian, the language I  
13 understand best, and I have carefully discussed every part of it with  
14 my attorney. I understand my Speedy Trial rights. I voluntarily  
15 agree to the continuance of the trial date, and give up my right to  
16 be brought to trial earlier than February 20, 2024.



12/29/24

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17 HAYK MARTIROSYAN  
18 Defendant

Date

20 CERTIFICATION OF INTERPRETER

21 I, George Madesyan, am fluent in the written and spoken English  
22 and Armenian languages. I accurately translated this entire  
23 agreement from English into Armenian to defendant Hayk Martirosyan on  
24 this date.



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25  
26 INTERPRETER

12/29/24

Date